## IN THE UNITED STATES DISTRICT COURT FOR THE **WESTERN DISTRICT OF ARKANSAS FAYETTEVILLE DIVISION**

AMANDA SCHATZ, individually and on behalf of all others similarly situated.	) ) )
Plaintiffs, v.	) ) Case. No. 5:20-cv-05066-TLB
QUAPAW HOUSE, INC.; CASEY BRIGHT.	) ) )
Defendants.	) }

## MOTION FOR ENTRY OF DEFAULT JUDGMENT

COMES NOW, the Plaintiff, Amanda Schatz, by and through her attorney, George M. Rozzell of Miller, Butler, Schneider, Pawlik, Rozzell, PLLC, and for her Motion for Entry of Default Judgment against the Defendants, Quapaw House, Inc. and Casey Bright, states as follows:

- 1. That this Court has jurisdiction of the parties and subject matter herein and that venue is proper.
- 2. That Plaintiff filed her Amended Complaint on November 5<sup>th</sup>, 2020.
- 3. That the Plaintiff provided proper service to Defendants by way of the Warning Order entered in this matter, which was published on the 25th day of February and 4th day of March 2021 in the Toledo Blade, and on the 27th day of February and the 6th day of March, 2021 in The Sentinel-Record. The Affidavit of Service by Warning Order was filed of record on March 12th, 2021.
- 4. That to the present date, the Defendant has wholly failed to appear or otherwise file any responsive pleading.
- 5. That pursuant to the Federal Rules of Civil Procedure, this Court should find the facts of the Amended Complaint as being true, confirm the Defendant's Default, and set this

matter for hearing on damages and to determine the Plaintiff's prayer for declaratory relief.

WHEREFORE, Plaintiff Amanda Schatz prays this Court enter an entry of Default Judgment against the Defendants, Quapaw House Inc. and Casey Bright, and set this matter for a hearing on damages, permit her to seek her costs and attorney fees for having to pursue this action, and for any and all other relief to which she may find herself entitled.

> Respectfully Submitted on behalf of herself and of all other similarly situated,

Amanda Schatz

BY: /s/George M. Rozzell IV George M. Rozzell IV AR Bar No. 2008032 Kristin Pawlik AR BAR No. 2015150 Miller, Butler, Schneider, Pawlik, & Rozzell PLLC 112 W. Center St. Favetteville, AR 72701 479.621.0006 grozzell@arkattorneys.com kpawlik@arkattorneys.com